UNITED STATES DISTRICT COURT DISTRICT OF NORTH DAKOTA

Jessica Allen, individually and on behalf of the heirs at Law of Lacey Higdem,) Civil No. 3:22-CV-93 (PDW/ARS)
Plaintiff,)))
vs. Myles Brunelle, in his individual capacity; April Azure, in her individual capacity; Rolette County; Roy Cordy, MD; and Presentation Medical Center,	AMY G. JONES IN SUPPORT OF PLAINTIFF'S MOTION TO UNSEAL DOCUMENTS)
Defendants.))

I, Amy G. Jones, declare and state as follows:

- 1. I am over the age of 18.
- 2. I work as a Legal Assistant at Robins Kaplan LLP.
- 3. This declaration is submitted in support of Plaintiff's Motion to Unseal Documents.
- 4. Plaintiff intended to file certain control-room videos from the Rolette County Jail in response to the County Defendants' Motion for Summary Judgment. Robins Kaplan partner Andrew Noel explained to me that under the Court's Guide to Filing Sealed Documents & Motions ("Guide"), he did not believe he needed leave to file the control-room videos under seal, as the County Defendants' summary-judgment memorandum was already under seal and the control-room videos were responsive to that document. Nevertheless, in an abundance of caution, Mr. Noel requested that I contact the Clerk's Office before filing the videos to confirm his understanding was correct.

5. I then called the Clerk's Office of the United States District Court for the District of North Dakota. I do not remember the name of the person to whom I spoke. I explained that Plaintiff intended to file a sealed memorandum and sealed exhibits, which included videos, in response to the summary-judgment motion that was already under seal. The individual to whom I spoke confirmed that Mr. Noel's interpretation was correct, and Plaintiff did not require leave of Court to file a sealed responsive memorandum and exhibits since we were responding to a motion already filed under seal.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on the 4th day of March, 2025, at Minneapolis, Minnesota.

s/ Amy G. Jones

AMY G. JONES

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